

CERTIFIED MAIL
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February 13, 2006
66-ZE-1370-GVM-04

Puget Sound Clean Air Agency
Attn.: Operating Permit Certification
110 Union Street, Suite 500
Seattle, WA 98101

Subject: Boeing Renton, WA, Site Identification No. 13125,
Aerospace NESHAP Combined Annual and Semiannual Report,
Responsible Official Certified

The purpose of this letter is to submit per Air Operating Permit (AOP) 13125 the combined annual/semiannual Aerospace NESHAP compliance report for Boeing's Renton facility in Renton, Washington.

This semiannual report is submitted per AOP 13125 Section V.Q.3(b) and covers the July 1, 2005 to December 31, 2005 reporting period.

This annual report is submitted per AOP 13125 Section V.Q.3(c) and covers the January 1, 2005 to December 31, 2005 reporting period.

If you have any questions, please contact Guy Moellendorf at (425) 965-2299, or me as shown below.

Sincerely,

Michael Verhaar
Environmental Affairs Manager
737 Programs
E-1370, MC 67-74
(425) 965-1567

**Semiannual Compliance Certification Report for the Semiannual Reporting Period
July 1, 2005 to December 31, 2005 [AOP V.Q.3(b)]**

The Boeing Renton facility conducts operations subject to 40 CFR 63, Subpart GG, with the exception of the following activities that were not conducted during the semiannual reporting period:

- This facility did not use enclosed spray gun cleaners.
 - This facility did not use any organic HAP or VOC control devices when applying primers and topcoats.
 - This facility did not utilize averaging for uncontrolled primers and topcoats to meet specified HAP and VOC content limits.
 - This facility did not repaint more than six completed aircraft in a calendar year.
 - This facility did not perform any chemical milling maskant operations.
 - This facility had no ANESHAP affected units subject to the SSM Planning requirement.
1. *Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation. [AOP V.Q.3(b)(1)]*
 - There were no occurrences of the use of noncompliant cleaning solvent for a non-exempt hand-wipe cleaning operation during the semiannual reporting period.
 2. *A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 63.744(b)(1). (As implemented by AOP EU 3.38) [AOP V.Q.3(b)(2)]*
 - There were no solvent used for hand-wipe cleaning operations for the first time during the semiannual reporting period.
 3. *Any instance where a noncompliant spray gun cleaning method was used. [AOP V.Q.3(b)(3)]*
 - There were no occurrences of the use of noncompliant spray gun cleaning methods during the semiannual reporting period.
 4. *Any instance where a leaking enclosed spray gun cleaner remains un-repaired and in use for more than 15 days. [AOP V.Q.3(b)(4)]*
 - This facility did not use enclosed spray gun cleaners during the semiannual reporting period.
 5. *If the cleaning operations have been in compliance for the semiannual period, a statement that cleaning operations have been in compliance with the applicable standards. [AOP V.Q.3(b)(5)]*
 - The cleaning operations have been in compliance with the applicable cleaning operation standards of AOP EU 3.31-3.41 for the semiannual reporting period.

6. *For cleaning operations, a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements. [AOP V.Q.3(b)(6)]*
 - The facility has been in compliance with all applicable requirements for cleaning operations of AOP EU 3.31- EU 3.48 for the semiannual reporting period.
7. *For primers and topcoats where there is no averaging or a control device, each value of Hi and Gi that exceeds the applicable organic HAP or VOC content limit. [AOP V.Q.3(b)(7)]*
 - There were no occurrences of the use of primers or topcoats that exceed the applicable organic HAP or VOC limits of AOP EU 3.52 during the semiannual reporting period.
8. *For primers and topcoats that are averaged, each value of Ha and Ga that exceeds the organic HAP or VOC content limit. [AOP V.Q.3(b)(8)]*
 - This facility did not utilize averaging for uncontrolled primers and topcoats to meet the applicable HAP and VOC limits of AOP 3.52 during semiannual reporting period.
9. *All times when applying inorganic HAP-containing materials that a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, or the water flow rate through a waterwash system, as appropriate, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. [AOP V.Q.3(b)(9)]*
 - There was no instance where an inorganic HAP-containing primer or topcoat application operation was not immediately shut down when the pressure drop or flow rate was outside the specified operating range during the semiannual reporting period.
10. *If the primer and topcoat operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards. [AOP V.Q.3(b)(10)]*
 - The primer and topcoat operations have been in compliance with the primer and topcoat application standards of AOP EU 3.50-3.55 and EU 3.61-3.74 for the semiannual reporting period.
11. *For depainting operations where the facility depaints more than 6 completed aircraft in a calendar year.... [AOP V.Q.3(b)(11)]*
 - This facility did not depaint more than six completed aerospace vehicles in a calendar year since September 1, 1998.

Annual Compliance Certification Report for the annual Reporting Period January 1, 2005 to December 31, 2005 [AOP V.Q.3(c)]

12. *The number of times that the pressure drop or water flow rate for each dry filter or water wash system was outside the limit(s) and, if the facility depaints more than 6 completed aircraft in a calendar year, the average volume per aircraft of organic HAP-containing strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limit specified in 40 CFR 63.746(b)(3) (as implemented in EU 3.85). [AOP V.Q.(3)(c)]*

- There were no instances where the pressure drop or water flow rate was outside the specified operating range during the annual reporting period. The facility did not depaint more than six completed aircraft during a calendar year since September 1, 1998.

Certifications:

For the semi-annual reporting period from July 1, 2005 to December 31, 2005:

To the best of my knowledge, based on reasonable inquiry the Boeing Renton facility has complied with applicable requirements of 40 CFR 63 Subpart GG (as implemented by AOP 13125) as indicated above.

I certify, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate, and complete.

Name of Responsible Official: Mark Jenkins

Title of Responsible Official: Vice President - General Manager, 737 Airplane Production

Signature of Responsible Official: _____

Date: _____